



# California Air Resources Board Greenhouse Gas Verification

## Emissions Data Verification Fact Sheet for GHG Emissions Reporters

### Verification Deadlines

- All emissions data reports must be verified in 2010
- Deadlines for verification opinion is 6 months after reporting deadline
  - Verification deadlines are October 1 and December 1, depending on the sector reporting deadline of April 1 or June 1 [§95103(b)-(c)]

### Engaging a Verifier

- Operators should engage with a verification body as early as possible to ensure verification services are complete before verification deadline
  - Verification process can take longer than anticipated, especially in the first year
  - Regulation allows 45 days for ARB to review conflict of interest, and a 10 working day waiting period following submittal of a notice of verification services [§95133(f), §95131(a)]
  - Verifiers are required to give operators at least 10 working days to address a potential adverse opinion prior to the deadline [§95131(c)(3)]
- ARB is not involved in contracting process
- Reporters may choose a verification body from the list of ARB accredited verification bodies and verifiers (<http://www.arb.ca.gov/cc/reporting/ghg-ver/ghg-ver.htm>)

### Conflict of Interest (COI)

- COI review form submitted by verification body to ARB
- COI is evaluated between the verification body and the company with operational control, not necessarily at the corporate level [§95133]
- Any work within the last 3 years with a verification body must be disclosed to ARB by the verifier, along with any other planned future work [§95133(e)]
- Depending on the nature of the work and when it took place, it may constitute a high, medium or low COI [§95133(b)]
- ARB may contact operators to assess the validity of information disclosed by verifiers on the COI forms
- No verification services may begin until ARB has reviewed the potential for COI between the operator and verification body, and 10 days after ARB has received the notice of verification services [§95131(a)]

## **Operator Requirements for Verification Process**

- Operators are required by regulation to give verifiers access to all information relevant to calculating GHG emissions or electricity transactions [§95131(b)(6)], including original documentation, financial records and any other relevant documentation used to support emission calculations (fuel purchase invoices, data spreadsheets, data management systems, instrument maintenance and calibration records, etc.)
- Operators should address confidentiality concerns in their contracts with verifiers
- Operators are required to facilitate a site visit by the verifier
  - Provide access to meters, data management systems, staff involved in developing emissions data report, etc. [§95131]
- Operators are required to make revisions to emissions data reports if verifier discovers material errors
  - Verifier will “unlock” emissions data report in the reporting tool so that modifications can be made, and the operator will re-certify the data when revisions are complete [§95131(b)(11)]
  - Most errors can be corrected to avoid an adverse opinion if addressed in a timely manner
- Change log - operators are required to keep a log of any changes in calculation methodologies and emission sources [§95105(c)(12)]

## **Verification Opinion**

- Verification opinion submitted by verifier to operator and ARB
- Detailed verification report submitted to the operator
- An emissions data report must both be accurate (contain no material misstatement) and prepared in conformance with regulatory requirements [§95131(c)]
  - Failure to meet either will result in an adverse opinion [§95102(a)(2)]
- Verification bodies are not paid to provide positive opinions or fix errors
  - Their job is to impartially assess materiality and conformance
  - Verifiers must identify issues and errors for the operator, but cannot consult on how to correct data
- An adverse verification opinions does not always lead to enforcement action
  - ARB’s primary concern is the reporting of high-quality emissions data, and will work with operators to ensure underlying issues are corrected in a timely manner

## **More Information**

Detailed information about verification may be found here:

<http://www.arb.ca.gov/cc/reporting/ghg-ver/ghg-ver.htm>.

Questions may be sent to [ghgverify@arb.ca.gov](mailto:ghgverify@arb.ca.gov).

The reporting regulation is located here:

<http://www.arb.ca.gov/regact/2007/ghg2007/frofinoal.pdf>